



**TEXANS** FOR  
**SAFE AND**  
**DRUG-FREE**  
**YOUTH**

2211 SOUTH IH-35, SUITE 201  
AUSTIN, TEXAS 78741  
T 512.442.7501  
F 512.474.2690  
TxSDY.ORG

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E-Mail to: [Sam.bacarisse@house.texas.gov](mailto:Sam.bacarisse@house.texas.gov)  
Texas House of Representatives  
Licensing & Administrative Procedures Committee  
P.O. Box 2910  
Austin, Texas 78768

Dear Chair King, Vice Chair Goldman, and Committee Members:

Regarding Interim Charge 3, we would like to call on the Committee to implement a critical process change before any further discussion on the Charge occurs. We are writing to advocate for the inclusion of public health professionals/entities during any discussions related to any changes to the Texas Alcoholic Beverage Code. The public health voice is a critical piece of any such conversations, as reflected in the Texas Alcoholic Beverage Commission's (TABC) mission, which is to "serve the people of Texas and protect the public health and safety through consistent, fair, and timely administration of the Alcoholic Beverage Code." To uphold this mission, public health professionals versed in alcohol policy must be included at all stages of the process when considering policy, rule, and code changes.

The three-tier system of alcohol distribution was designed to regulate alcohol because it is not an ordinary commodity. In part, this regulatory framework was put in place to protect the public (both consumers and non-consumers) from alcohol misuse and associated harms. The checks and balances within the three-tier system provide a foundation to protect both public health and safety.

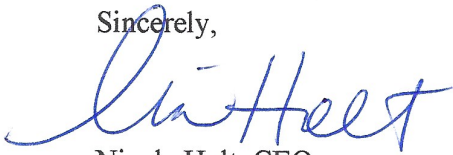
Specifically, we recommend that prior to any additional action or review on the matter, public health and safety review and insight be incorporated. Just as HCR 168 86(R) requires the agency "seek input from the alcoholic beverage industry", so too should input from public health and safety sector be required. Our recommendation calls for public health officials to be fully informed on the proposed Interim Charge, all discussion to date and to be a part of any and all review moving forward. Additionally, public health must have the opportunity to submit reports and recommendations for the committee's and public's review. As stated previously, public health must be involved from the beginning of any code or rule change process in order to evaluate the changes and ensure they do not have a negative impact on public health and safety. Providing an opportunity for public comment alone does not sufficiently address the need to discern the impact on public health and safety.

Finally, expertise sought for the public health and safety framework must come from organizations or entities, such as ours, that have specific knowledge of the relationship between alcohol policy and public health and safety. Such groups have the unique ability to consider consumer choice and economic interests alongside the potential public health and safety implications. Those without this specific expertise may not recognize the potential harms of policy and code changes until it is too late to reverse course.

Thank you for your consideration and time. If you have any questions, we are always available. We stand ready to provide any needed assistance, including recommendations of public health professionals/entities.

Contact Kolby Monnig, Director of Campaigns for Social Change, at [kmonnig@txsdy.org](mailto:kmonnig@txsdy.org).

Sincerely,

A handwritten signature in blue ink, appearing to read "Nicole Holt", with a stylized, cursive script.

Nicole Holt, CEO

Texans for Safe and Drug-Free Youth is the state's leading organization working to end underage alcohol, tobacco, and other drug use. Founded in 1997, with funding from the Robert Wood Johnson Foundation administered by the American Medical Association, the statewide coalition builds on the strengths and successes of its longtime identity, Texans Standing Tall, while bringing new focus and energy to its mission of creating healthier and safer communities.